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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

THOMAS ROGER WHITE, JR. and  
CHRISTOPHER MILLS, on behalf of  
themselves and all others similarly  
situated,

Plaintiffs,

v.

LG ELECTRONICS, INC., LG  
ELECTRONICS U.S.A., INC.,  
SAMSUNG ELECTRONICS CO. LTD.,  
SAMSUNG ELECTRONICS  
AMERICA, INC., SONY  
CORPORATION, and SONY  
ELECTRONICS CORPORATION,

And

John and Jane Does (1-Unlimited)

And

ABC Corporations (1-Unlimited),

Defendants.

Civil Action No. 17-1775  
(MCA)(SCM)

Hon. Madeline Cox Arleo, U.S.D.J.  
Hon. Steven C. Mannion, U.S.M.J.

**Return Date:** \_\_\_\_\_

(Oral Argument Requested)

*Document Electronically Filed*

**NOTICE OF MOTION TO  
STAY DISCOVERY BY  
DEFENDANTS LG  
ELECTRONICS U.S.A., INC.  
SAMSUNG ELECTRONICS  
AMERICA, INC., AND SONY  
ELECTRONICS INC.**

**PLEASE TAKE NOTICE** that on a date to be set by the Court, at 9:30

a.m., or at such time as may be set by the Court, Defendants LG Electronics U.S.A., Inc., Samsung Electronics America, Inc., and Sony Electronics Inc. (collectively, “Defendants”), by and through their undersigned attorneys, will move before the Honorable Steven C. Mannion, U.S.M.J., United States District Court for the District of New Jersey, Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Courtroom 2B, Newark, New Jersey 07101, for an Order staying discovery pending the outcome of Defendants’ Motion to Dismiss [D.E. 54]. Pursuant to the Court’s Pretrial Scheduling Order, Docket Entry 66, any responses shall be filed by April 18, 2018, and there shall be no replies.

**PLEASE TAKE FURTHER NOTICE** that in support of this Motion, Defendants will rely on the accompanying brief, and all pleadings and proceedings on file.

**PLEASE TAKE FURTHER NOTICE** that a Proposed form of Order is being submitted herewith.

**PLEASE TAKE FURTHER NOTICE** that Defendants hereby request oral argument.

Dated: April 6, 2018

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Respectfully submitted,

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